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Attorney for Defendant
TIFFANY TIARRA HENDERSON

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIFFANY TIARRA HENDERSON,

Defendant.

CASE NO: 2:18-CR-356-APG-DJA

**STIPULATION TO EXTEND TIME
TO FILE SENTENCING
MEMORANDUMS**

ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Peter Levitt, Assistant United States Attorney, counsel for the United States of America, and Yi Lin Zheng, Esq., CJA counsel for TIFFANY TIARRA HENDERSON, that the time for the filing of Sentencing Memorandums be extended. The Defendant shall have until June 19, 2020, at 5:00 p.m. and the Government shall have until June 22, 2020, at 5:00 p.m. to file a Sentencing Memorandum. This Stipulation is entered into for the following reasons:

1. That a denial of this continuance would deny time in which to effectively and thoroughly prepare a sentencing memorandum, taking into account the exercise of due diligence. It would also deny the Government an opportunity to respond.

2. That an extension of time is necessary because present CJA counsel was appointed as new counsel on June 16, 2020 (ECF #110), the same day that the sentencing memorandum was due given the June 23, 2020 sentencing date that is currently scheduled.

3. That counsel has discussed with defendant, in detail throughout multiple conversations, her concerns with prior counsel, the guideline calculations contained in the Plea Agreement and the Revised PSR, the possible outcomes of best and worse case scenarios at sentencing, and the potential risk of moving forward so quickly with new counsel. Defendant is adamant and has directed present counsel to move forward with sentencing on Tuesday, June 23, 2020.

4. In order to effectively and thoroughly review all necessary data, have time to confer with client, and draft a meaningful sentencing memorandum on defendant's behalf counsel requires additional time. Likewise, the Government would need an opportunity to respond.

5. That the enlargement of time to file the Sentencing Memorandums would allow the Sentencing date currently scheduled to remain as is.

6. That counsel for the Defendant has consulted with AUSA Peter Levitt and he does not object to said enlargement of time to allow the Defendant until June 19, 2020, at 5:00 p.m. and the Government until June 22, 2020, at 5:00 p.m. to file a Sentencing Memorandum.

STIPULATION entered by:

_____/s/_____
YI LIN ZHENG, ESQ.
Nevada Bar No. 10811
530 S. Seventh St.
Las Vegas, Nevada 89101
Attorney for the Defendant
TIFFANY TIARRA HENDERSON

STIPULATION entered by:

_____/s/_____
NICHOLAS A. TRUTANICH
United States Attorney
PETER LEVITT
Assistant United States Attorney
501 Las Vegas Blvd. South, Ste. 1100
Las Vegas, Nevada 89101

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4

5 Plaintiff,

6 vs.

7 TIFFANY TIARRA HENDERSON,
8

9 Defendant.

CASE NO: 2:18-CR-356-APG-DJA

**ORDER TO EXTEND TIME TO FILE
SENTENCING MEMORANDUMS**

10 Upon Stipulation of the parties:

11 **IT IS HEREBY ORDERED** that the Defendant shall have until June 19, 2020, at 5:00
12 p.m. to file a Sentencing Memorandum.

13 **IT IS FURTHER ORDERED** that the Government shall have until June 22, 2020, at
14 5:00 p.m. to file a Sentencing Memorandum

15 DATED this 18th day of June, 2020.

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19 UNITED STATES DISTRICT COURT JUDGE
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